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112055-0040
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REMARKS

The present response is within the three month period after the final office action dated 11/20/2003. Although this amendment is not within the two month period, it is sincerely hoped that the Examiner will consider this filing, as it is believed this amendment places the application in a form for allowance.

The present response amends the remaining claims in the application to overcome the objections made by the Examiner.

First the claimed reference to connections to a printed circuit board in claim 45 have been deleted, and the remaining claims have been amended to distinguish the Kuhn (US 5,793,101) reference.

Claims 18, 19, 21, 23, 34-37, and 45 were rejected under 35 102(b) as being anticipated by Kuhn. In particular, the word "single" has been added to the independent claims so that the claims are limited to a substrate mounting a single chip. This is supported in the original application. In particular on page 3, the first sentence under SUMMARY states, "...that would permit the connection of a die-down chip in a die-up configuration." The article "a" refers to a single chip. The remaining text under SUMMARY speaks to "a" chip or "a" die. Also, on page 4, lines 13, 14, describes "...a substrate 101 with a plurality of patterned traces 102-107 that provide connections from a die 108 to a printed circuit board (not shown). Item 108 is a single die shown mounted to a substrate in FIGS. 3, 4 in the original application. The word "single" is not used in the

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original text, but the word "a" is used referring to the solitary or single die 108. So, "single" describes what was originally shown and is not new matter.

In the Office Action, on page 5, item 22, the Examiner notes that the claims do not recite a claimed substrate exclusive for mounting a single chip. The Examiner goes on to state that this limitation does not have support in the specification as originally filed.

It is respectfully pointed out that there is only a single die described and shown in the specification, drawings and claims as originally filed. For example see the above references in the original application. There is no suggestion or reference to multiple dies being mounted on the inventive substrate – only single chips or dies are shown. As now amended the claims are limited to a substrate for mounting a single die.

Kuhn only shows apparatus for mounting two dies within the same package. It is a reasonable question as to whether Kuhn suggests or anticipates a package for only one die. It is believed that Kuhn is limited to mounting multiple dies exclusively. It is hoped that the Examiner agrees. First the Kuhn's title is "PACKAGE HOUSING MULTIPLE SEMICONDUCTOR DIES." Kuhn's invention as claimed only refers to multiple dies, and although the text could suggest use with one die, Kuhn's text does not, because Kuhn's invention is to mount multiple chips in one package.

Kuhn's invention is the flexible circuit that can be folded around a paddle to "greatly increase(s) IC density and is capable of accommodating a variety of different sizes of semiconductor die." See the first paragraph under SUMMARY.

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It is reasonable to investigate if Kuhn inherently contains the present invention as claimed. In such a case, there would have to be some indication of mounting a single die and there is no such indication. Next, there would have to be indication that the flexible circuit makes the reversals as claimed in the present invention, and there is no such indication. Presumably, Kuhn's flexible circuit could be configured to provide the same pin out reversal as claimed in the present invention, but there is no such indication or motive offered that would lead Kuhn to do so. Kuhn is solving a different problem than is the present invention, and it would require Kuhn to recognize the advantages of the present invention or the problems solved by the present invention, but Kuhn do not do so.

It is respectfully requested that the Kuhn reference be removed as a reference against the present claims as now amended, and that a notice of allowability be issued.

Please charge any additional fee occasioned by this paper to our Deposit Account No. 03-1237.

Respectfully submitted,

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